

## EXHIBIT B

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CHRISTINE SARACENI,

Plaintiff,

Case No.: 19-cv-1152

v.

M&T BANK CORPORATION,

Defendant.

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**RULE 26(a)(1) INITIAL DISCLOSURES**

Defendant M&T Bank Corporation (“M&T”), by its attorneys, Hodgson Russ LLP, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, makes the following initial disclosures. M&T makes these disclosures based on information reasonably available to it at this time and reserves the right to supplement these initial disclosures after further investigation and discovery, pursuant to Federal Rule of Civil Procedure 26(e). By describing documents and potential witnesses, M&T does not waive its rights to object to the production of any document or testimony of such witness on any ground, including attorney-client privilege, the work product doctrine, relevance, or other limitations provided for in the Federal Rules of Civil Procedure.

**I. Rule 26(a)(1)(A)(i). Individuals.** The name and, if known, the address and telephone number of each individual likely to have discoverable information- along with the subjects of that information- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

<u>Individual</u>	<u>Subject Matter</u>
Jane Harrington Former Administrative Vice President, Manager – LPO Production/Sales in the Reverse Mortgage Administration Department <i>Contact through counsel</i>	Ms. Saraceni's requests in the weeks prior to her departure from M&T. The nature and characteristics of the documents Ms. Saraceni sent to herself and her husband prior to her departure from M&T.
Meghan Frank Vice President, Senior Employee Relations Specialist in the HR Risk and Shared Services Department <i>Contact through counsel</i>	Review of Ms. Saraceni's email correspondence and decision to suspend benefits under her Severance Agreement and M&T Bank Corporation Employee Severance Pay Plan.
Tyler Verrall Banking Officer, Digital Forensics Investigator in the Physical Security and Investigations Department <i>Contact through counsel</i>	Email correspondence of Ms. Saraceni.
Arthur Salman, Esq. Group Vice President, Director Employee Relations in the HR Risk & Shared Services Department <i>Contact through counsel</i>	Review of Ms. Saraceni's email correspondence and decision to suspend benefits under her Severance Agreement and M&T Bank Corporation Employee Severance Pay Plan.
Christine Saraceni	Ms. Saraceni's requests in the weeks prior to her departure from M&T. The nature and characteristics of the documents Ms. Saraceni sent to herself and her husband prior to her departure from M&T. Request to destroy documents sent outside of M&T. Use of documents sent outside of M&T.
James Saraceni	The nature and characteristics of the documents Ms. Saraceni sent to herself and her husband prior to her departure from M&T. Request to destroy documents sent outside of M&T. Use of documents sent outside of M&T.

**II. Rule 26(a)(1)(A)(ii). Documents and Things.** The following categories of documents in paper and/or electronic format and things are located at Defendant's offices at One M&T Plaza, Buffalo, NY 14203 and on M&T's computer servers:

- Documents reflecting the Administrative Record, provided to Ms. Saraceni on December 31, 2019.
- Documents reflecting written or oral communications between M&T Bank and Ms. Saraceni, if any.
- Documents reflecting written communications between Ms. Saraceni and her husband, through Ms. Saraceni's M&T email account.
- Documents reflecting written communications between Ms. Saraceni's M&T email account and her personal email account.
- Documents reflecting written communications between Ms. Saraceni and possible third parties, if any.
- Communications between Ms. Saraceni and M&T personnel in the weeks leading up to her departure.
- Documents evidencing relevant M&T Policies and Plan Documents.
- Documents evidencing Ms. Saraceni's payroll information, provided to Ms. Saraceni on June 2, 2020.

**III. Rule 26(a)(1)(A)(iii). Damages.** M&T is claiming damages for Ms. Saraceni's breach of the duty of loyalty in an amount to be determined during discovery.

**IV. Rule 26(a)(1)(A)(iv). Insurance.** None.

Dated: September 4, 2020

**HODGSON RUSS LLP**  
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